

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

* CRIMINAL NO. CCB-20-0356

* (Unlawful Procurement of Citizenship or Naturalization, 18 U.S.C. § 1425; False Statement, 18 U.S.C. § 1001)

Defendants

*

<u>INDICTMENT</u>

<u>COUNT ONE</u> (Unlawful Procurement of Citizenship or Naturalization)

The Grand Jury for the District of Maryland charges that:

On or about August 4, 2015, in the District of Maryland, the defendant,

ANA ELIZABETH MOLINA,

knowingly procured and attempted to procure, contrary to law, naturalization and citizenship by misrepresenting on her application for naturalization material facts, to wit: on her form N-400 (Application for Naturalization) the defendant lied about her employment status by falsely representing herself as unemployed and, in response to the question "Have you **ever** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **not** arrested?" failed to disclose her ongoing crimes of embezzlement against her elderly employer.

18 U.S.C. § 1425(a)

COUNT TWO

The Grand Jury for the District of Maryland charges that:

On or about December 17, 2015, in the District of Maryland, the defendant,

ANA ELIZABETH MOLINA,

in a matter within the jurisdiction of the U.S. Citizenship and Immigration Services, an agency of

the executive branch of the government of the United States, knowingly and willfully made a

materially false, fictitious and fraudulent statement and representation, in that she affirmed under

oath to a Citizenship and Immigration Services agent that she was unemployed and had not

committed any crimes for which she had not been charged, whereas in truth and in fact she had

been employed continuously for more than three years by a vulnerable adult victim from whom

she had already embezzled over \$400,000 and was in the process of defrauding of an additional

\$1.3 million.

18 U.S.C. § 1001

Nalut M Has / 4KA
Robert K. Hur

United States Attorney

A TRIJE BILL.

Foreperson

Date: October , 2020

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